Social Media Protocol

The Rivers C of E Academy Trust

Committee:	
Approved on:	September 2022 – see Every
Next review date:	September 2024

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Appendices

Statement of intent

The Rivers CofE Academy Trust understands that social media is a growing part of life outside of school. We have a responsibility to safeguard our pupils against potential dangers when accessing the internet at school, and to educate our pupils about how to protect themselves online when outside of school.

We are committed to:

- Encouraging the responsible use of social media by all staff, parents and pupils in support of the school's mission, values and objectives.
- Protecting our pupils from the dangers of social media.
- Preventing and avoiding damage to the reputation of the school through irresponsible use of social media.
- Protecting our staff from cyberbullying and potentially career damaging behaviour.
- Arranging online safety meetings for parents.

1. Legal framework

This protocol has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- DfE (2018) 'Data protection: a toolkit for schools'
- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Computer Misuse Act 1990, amended by the Police and Justice Act 2006
- The Freedom of Information Act 2000
- The Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010

This protocol operates in conjunction with the following trust and school policies, procedures and protocols:

- Acceptable Use Policy
- Online Safety Policy
- Data Protection Policy
- Pupil Code of Conduct
- Complaints Procedures Policy
- Anti-bullying Policy
- Allegations of Abuse Against Staff Policy
- Photography Policy
- Staff Code of Conduct
- Confidentiality Policy
- Data and Cyber-Security Breach Prevention and Management Plan
- Child Protection and Safeguarding Policy
- Disciplinary Policy and Procedures
- Behavioural Policy

2. Roles and responsibilities

The headteacher/head of school is responsible for:

- The overall implementation of this protocol and ensuring that all staff, parents and pupils are aware of their responsibilities in relation to social media use.
- Promoting safer working practices and standards with regards to the use of social media.
- Establishing clear expectations of behaviour for social media use.
- Ensuring that this protocol, as written, does not discriminate on any grounds, including against any of the protected characteristics, as outlined in the Equality Act 2010.
- Handling complaints regarding this protocol and its provisions in line with the school's Complaints Procedures Policy.
- Implementing appropriate sanctions and disciplinary methods where there is a breach of this protocol.
- Taking steps to minimise the amount of misplaced or malicious allegations in relation to social media use.

- Working alongside the Computing and Digital Innovation Lead and data protection officer (DPO) to ensure appropriate security measures are implemented and compliance with UK GDPR.

The Computing and Digital Innovation Lead is responsible for:

- Ensuring the DSL's remit covers online safety.
- Reviewing this protocol on a bi-annual basis.
- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction.

All staff members are responsible for:

- Adhering to the principles outlined in this protocol and the Technology Acceptable Use Agreement – Staff.
- Ensuring pupils adhere to the principles outlined in this protocol and that it is implemented fairly and consistently in the classroom.
- Reporting any social media misuse by staff, pupils or parents to the headteacher immediately.
- Attending any training on social media use offered by the school.

Parents are responsible for:

- Adhering to the principles outlined in this protocol and the Social Media Code of Conduct for Parents.
- Taking appropriate responsibility for their use of social media and the influence on their children at home.
- Promoting safe social media behaviour for both themselves and their children.
- Attending online safety meetings held by the school wherever possible.
- Not engaging in activities involving social media which might bring the school into disrepute.
- Not representing their personal views as those of the school on any social medium.
- Acting in the best interests of pupils when creating, participating in or contributing to social media sites.

Pupils are responsible for:

- Adhering to the principles outlined in this protocol and the Pupil Code of Conduct.
- Ensuring they understand how to use social media appropriately and stay safe online.
- Seeking help from school staff if they are concerned about something they or a peer have experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.
- Demonstrating the same high standards of behaviour as expected within the school.

The Marketing Manager is responsible for:

- Monitoring and reviewing all school-run social media accounts.

- Vetting and approving individuals who wish to be 'friends' or 'followers' on the school's social media platforms.
- Consulting with staff on the purpose of the social media account and the content published.
- Maintaining a log of inappropriate comments or abuse relating to the school.
- Handling inappropriate comments or abuse posted on the school's social media accounts, or regarding the school.
- Creating a terms of use agreement, which all content published must be in accordance with.
- Ensuring that enough resources are provided to keep the content of the social media accounts up-to-date and relevant.

The Managed Service Provider (Joskos) are responsible for:

- Providing technical support in the development and implementation of the school's social media accounts.
- Implementing appropriate security measures as directed by the headteacher.
- Ensuring that the school's filtering and monitoring systems are updated as appropriate.

3. Definitions

For the purpose of this protocol, the school defines **"social media"** as any online platform that offers real-time interaction between the user and other individuals or groups including, but not limited to, the following:

- Blogs
- Online discussion forums, such as NetMums
- Collaborative spaces, such as Facebook
- Media-sharing devices, such as YouTube
- 'Micro-blogging' applications, such as Twitter

For the purpose of this protocol, **"cyberbullying"** is defined as any social media or communication technology intentionally used to bully an individual or group, including the posting or sharing of messages, images or videos.

For the purpose of this protocol, **"members of the school community"** are defined as any teacher, member of support staff, pupil, parent of a pupil, governor or ex-pupil.

4. Data protection principles

The school will obtain consent from pupils and parents using the media consent form, which will confirm whether or not consent is given for posting images and videos of a pupil on social media platforms. The consent will be valid until a parent withdraws any consent. Consent provided for the use of images and videos only applies to school accounts – staff, pupils and parents are not permitted to post any imagery or videos on personal accounts.

Where a pupil is assessed by the school to have the competence to understand what they are consenting to, the school will obtain consent directly from that pupil; otherwise, consent is obtained from whoever holds parental responsibility for the pupil.

A record of consent is maintained, which details the pupils for whom consent has been provided. The DPO is responsible for ensuring this consent record remains up-to-date.

Parents are able to withdraw or amend their consent at any time. To do so, parents must inform the school in writing. Where parents withdraw or amend their consent, it will not affect the processing of any images or videos prior to when consent was withdrawn or amended. Processing will cease in line with parents' requirements following this. Wherever it is reasonably practicable to do so, the school will take measures to remove any posts before consent was withdrawn or amended, such as removing an image from a social media site.

Consent can be provided for certain principles only, for example only images of a pupil are permitted to be posted, and not videos. This will be made explicitly clear on the consent from provided. The school will only post images and videos of pupils for whom consent has been received.

Only school-owned devices will be used to take images and videos of the school community, which have been pre-approved by the online safety officer for use. Only appropriate images and videos of pupils will be posted in which they are suitably dressed, i.e. it would not be suitable to display an image of a pupil in swimwear.

When posting on social media, the school will use group or class images or videos with general labels, e.g. 'sports day'.

When posting images and videos of pupils, the school will apply data minimisation techniques, such as pseudonymisation (blurring a photograph), to reduce the risk of a pupil being identified. The school will not post pupils' personal details on social media platforms and pupils' full names will never be used alongside any videos or images in which they are present.

Before posting on social media, staff will:

- Refer to the consent record log to ensure consent has been received for that pupil and for the exact processing activities required.
- Ensure that there is no additional identifying information relating to a pupil.

Any breaches of the data protection principles will be handled in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan.

5. Staff social media use

School accounts

The school's social media sites will only be created and monitored by the Marketing Manager, Headteacher, Head of school and other designated staff members. There will be a strong pedagogical or business reason for the creation of social media accounts on behalf of the school; official school profiles and accounts will not be created for trivial reasons.

If members of staff wish to create a new social media account, they will put a request in writing to the Marketing Manager, who will approve it with the headteacher and then create the account on the behalf of the requesting individuals. The communications officer will be consulted about the purpose of the proposed site and its content.

A school social media account will be entirely separate from any personal social media accounts held by staff members and will be linked to an official school email account.

Consideration will be given to the following aspects:

- The purpose for using social media
- Whether the overall investment will achieve the pedagogical aim
- The level of interactive engagement with the site
- Whether pupils, staff, parents or members of the public will be able to contribute content to the account
- How much time and effort staff members are willing to commit to the proposed site
- A clear plan which outlines aspects such as how long the site will last
- How the success of the site will be evaluated

School social media passwords are kept securely – these are not shared with any unauthorised persons, including pupils, unless otherwise permitted by the headteacher. Staff will adhere to the data protection principles outlined in section 4 of this protocol at all times.

Staff will ensure any posts are positive in nature and relevant to pupils, the work of staff, the school or any achievements. Staff will not post any content online which is damaging to the school or any of its staff or pupils.

All content expressed on school social media accounts will not breach copyright, data protection or freedom of information legislation.

Staff will ensure the headteacher has checked the content before anything is posted on social media. If staff wish for reminders to be posted for parents, e.g. returning slips for a school trip, staff will seek permission from the headteacher before anything is posted.

If inappropriate content is accessed online, a report form will be completed and passed on to the DPO and Computing and Digital Innovation Lead. The DPO and Computing and Digital Innovation Lead retains the right to monitor staff members' internet usage in line with the Data and Cyber-security Breach Prevention and Management Plan.

The school's social media accounts will comply with site rules at all times, particularly with regards to the minimum age limit for use of the site. It will be noted that each networking site has their own rules which must be followed – the Marketing Manager will induct staff to each new social media platform, providing them with the relevant training and information.

Personal accounts

Staff members will not access social media platforms during lesson times, but they are permitted to use social media during break times. Staff will not use social media in front of pupils.

Staff members will not use any school-owned mobile devices to access personal accounts, unless it is beneficial to the material being taught - prior permission will be sought from the headteacher. Staff are not permitted to use the school's WiFi network to access personal accounts, unless otherwise permitted by the headteacher, and once the Computing and Digital Innovation Lead has ensured the necessary network security controls are applied.

Staff will not 'friend', 'follow' or otherwise contact pupils or parents through their personal social media accounts. If pupils or parents attempt to 'friend' or 'follow' a staff member, they will report this to the headteacher.

Staff members will not provide their home address, phone number, mobile number, social networking details or email addresses to pupils or parents – any contact with pupils or parents will be done through authorised school contact channels. Staff members will use their school email address for school business and personal email address for their private correspondence; the two should not be mixed.

Staff members will ensure the necessary privacy controls are applied to personal accounts and will avoid identifying themselves as an employee of the school on their personal social media accounts. Where staff members use social media in a personal capacity, they will ensure it is clear that views are personal and are not those of the school.

No staff member will post any content online that is damaging to the school or any of its staff or pupils. Staff members will not post any information which could identify a pupil, class or the school – this includes any images, videos and personal information. Staff will not take any posts, images or videos from social media that belong to the school for their own personal use. Staff members will not post anonymously or under an alias to evade the guidance given in this policy.

Breaches of this policy by members of staff will be taken seriously, and in the event of illegal, defamatory or discriminatory content, could lead to prosecution, disciplinary action or dismissal. Members of staff will be aware that if their out-of-work activity brings the school into disrepute, disciplinary action will be taken.

Attempts to bully, coerce or manipulate members of the school community via social media by members of staff will be dealt with as a disciplinary matter.

Social media will not be used as a platform to attack, insult, abuse or defame pupils, their family members, colleagues or other professionals.

Staff members' personal information will not be discussed on social media.

6. Parent social media use

Parents are able to comment on or respond to information shared via social media sites; however, parents should do so in a way which does not damage the reputation of the school.

Parents will be asked not to share any photos or personal details of pupils when commenting on school social media sites, nor post comments concerning other pupils or staff members, in accordance with the Social Media Code of Conduct for Parents.

Any parents that are seen to be breaching the guidance in this policy will be required to attend a meeting with the headteacher, and may have their ability to interact with the social media websites removed.

Breaches of this protocol will be taken seriously, and in the event of illegal, defamatory or discriminatory content could lead to prosecution.

7. Pupil social media use

Pupils are instructed not to sign up to any social media sites that have an age restriction above the pupil's age. Where a pupil or parent attempts to "friend" or 'follow' a staff member on their personal account, it will be reported to the headteacher.

Pupils will not post any content online which is damaging to the school or any of its staff or pupils. Pupils will not post anonymously or under an alias to evade the guidance given in this policy.

Pupils are instructed not to sign up to any social media sites that have an age restriction above the pupil's age.

If inappropriate content is accessed online on school premises, it will be reported to a teacher.

Breaches of this policy will be taken seriously, and in the event of illegal, defamatory or discriminatory content, could lead to exclusion.

8. Online safety

Any disclosures made by pupils to staff about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Child Protection and Safeguarding Policy.

Concerns regarding a staff member's online behaviour will be reported to the headteacher, who will decide on the best course of action in line with the relevant policies, e.g. the Staff Code of Conduct, Allegations of Abuse Against Staff Policy, and Disciplinary Policy and Procedures. If the concern is about the headteacher, it will be reported to the CEO.

Concerns regarding a pupil's online behaviour will be reported to the DSL, who will investigate any concerns with relevant staff members, e.g. the headteacher and ICT technicians, and manage concerns in accordance with relevant policies depending on their nature, e.g. the Behavioural Policy and Child Protection and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the headteacher will contact the police. The school will avoid unnecessarily criminalising pupils, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. a pupil has taken and distributed indecent imagery of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Child Protection and Safeguarding Policy.

9. Blocked content

In accordance with the school's Data and Cyber-security Breach Prevention and Management Plan, the online safety officer will install firewalls on the school's network to prevent access to certain websites. No social media sites are available on the school network for pupils, this includes:

- Twitter
- Facebook
- Instagram

- Youtube

The DPO and Computing and Digital Innovation Lead retain the right to monitor staff and pupil access to websites when using the school's network and on school-owned devices.

Attempts made to circumvent the network's firewalls will result in a ban from using school computing equipment, other than with close supervision.

Inappropriate content accessed on the school's computers will be reported to the DPO and Computing and Digital Innovation Lead so that the site can be blocked. Requests may be made to access erroneously blocked content by submitting a blocked content access form, which will be approved by the Director of Operations or Computing and Digital Innovation Lead.

10. Cyberbullying

Cyberbullying incidents are taken seriously at The Rivers CofE Academy Trust. Any reports of cyberbullying on social media platforms by pupils will be handled in accordance with the Anti-bullying Policy.

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the Anti-bullying Policy. Allegations of cyberbullying from staff members will be handled in accordance with the Allegations of Abuse Against Staff Policy.

11. Training

The school recognises that early intervention can protect pupils who may be at risk of cyberbullying or negative social media behaviour. As such, teachers will receive training in identifying potentially at-risk pupils. Teachers and support staff will receive training on social media as part of their new starter induction. Teachers and support staff will receive annual and ongoing training as part of their development.

Pupils will be educated about online safety and appropriate social media use on a termly basis through a variety of mediums, including assemblies, PSHE lessons and cross-curricular links. Pupils will be provided with material to reinforce their knowledge.

Parents will be invited to online safety and social media training on an annual basis and provided with relevant resources, such as our Social Media Code of Conduct for Parents.

Training for all pupils, staff and parents will be refreshed in light of any significant incidents or changes.

12. Monitoring and review

This Protocol will be reviewed on biannually by the headteacher, in conjunction with the Marketing Manager and DPO.

The next scheduled review date for this policy is September 2024.

Any changes made to this policy will be communicated to all staff, pupils and parents.

Blocked content access request form

Requester	
Staff name:	
Date:	
Full URL:	
Site content:	
Reasons for access:	
Identified risks and control measures:	
Authoriser	
Approved?	✓ / X
Reasons:	
Staff name:	
Date:	
Signature:	

Inappropriate content report form

Staff name (submitting report):	
Name of individual accessing inappropriate content (if known):	
Date:	
Full URL(s):	
Nature of inappropriate content:	
To be completed by online safety officer	
Action taken:	
Staff name:	
Date:	
Signature:	

Social media site creation approval form

Use of social media on behalf of the school must be approved by the headteacher prior to setting up sites. Please complete this form and return it to the headteacher.

Team details		
Department:		
Moderator of site:		
Purpose of using social media		
Please describe why you want to set up this site and the content of the site		
What are your aims and what do you hope to achieve by setting up this site?		
What is the proposed content of the site?		
Proposed audience of the site		
☐ Pupils of the school Ages: **age range**	☐ School staff	☐ Pupils' family members
☐ External organisations	☐ Pupils from other schools Schools involved: **The Rivers CofE Academy Trust**	☐ Members of the public
☐ Other (please give details)		
Proposed contributors to the site		
☐ Pupils of the school Ages: **age range**	☐ School staff	☐ Pupils' family members
☐ External organisations	☐ Pupils from other schools Schools involved: **The Rivers CofE Academy Trust**	☐ Members of the public
☐ Other (please give details)		
Administration of the site		
Names of administrators (the site must have at least **two** approved administrators):		

Who will vet external contributors? (Please state name and job role)	
Who will host the site?	
Proposed date of going live:	
How do you propose to advertise for contributors?	
If contributors include pupils, how do you propose to inform and obtain the consent of parents or responsible adults?	
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' and 'followers' etc. of the site?	

Approval		
Approval from relevant people must be obtained before the site can be created. The relevant managers must read this form and complete the information below before final approval can be given by the headteacher.		
Communications officer **I approve the aims and content of the proposed site and the use of the school brand and logo.**	Name:	
	Signature:	
	Date:	
Headteacher **I approve the aims and content of the proposed site and the use of the school brand and logo.**	Name:	
	Signature:	
	Date:	